

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN	:	
	:	
and	:	
	:	
KAMIL EKIM ALPTEKIN,	:	
	:	
Defendants.	:	

DEFENDANT RAFIEKIAN’S UNOPPOSED MOTION FOR A RULE 17(c) SUBPOENA

Pursuant to Federal Rule of Criminal Procedure 17(c), defendant Bijan Rafiekian hereby moves for an order permitting the issuance of subpoenas *duces tecum*, commanding the pretrial production of certain documents from Covington & Burling LLP (“Covington”) and Kristen Verderame (“Verderame”), as more particularly set forth in the attached Memorandum of Law and Attachment A. As required by Rule 17(c), the documents requested are relevant, admissible, and specific. Mr. Rafiekian respectfully requests that the Court grant the instant motion and enter an order permitting him to issue the Subpoenas. The Government does not oppose the instant motion but also does not adopt or endorse any of the factual assertions or legal conclusions reflected in the attached Memorandum of Law.

Defendant respectfully requests that the Court hear this motion on its next motion day, March 8, 2019.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of March 2019, a true and genuine copy of Defendant Rafiekian's Motion for a Rule 17(c) Subpoena and Memorandum of Law was sent via electronic mail by the Court's CM/ECF system to the following:

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/s/

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